

# **EXHIBIT A**



Previn Waran &lt;pwaran@graelaw.com&gt;

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**Kabir v. The Masalawala LLC et al. - Civil Action No. 1:21-cv-10289-JPO**

4 messages

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**Louis Leon** <lleon@cafaroescq.com>  
To: Previn Waran <pwaran@graelaw.com>  
Cc: Charlie Mueller <cmueller@graelaw.com>

Mon, Feb 6, 2023 at 10:11 AM

Previn:

I was able to locate my client. Please advise if you will agree to cancel tomorrow's conference. Given that the conference is scheduled for tomorrow at 4:00 p.m., if I do not hear back from you soon, I will have to write to the Court without your input. Thanks.

**Sincerely,**  
**Louis M. Leon, Esq.**  
**Associate**

Description: Doc1

[108 West 39<sup>th</sup> Street, Suite 602](#)[New York, NY 10018](#)[Main \(212\) 583-7400](#)[Fax. \(212\) 583-7401](#)[LLeon@CafaroEsq.com](mailto:LLeon@CafaroEsq.com)image001.jpg  
4K

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**Previn Waran** <pwaran@graelaw.com>  
To: Louis Leon <lleon@cafaroescq.com>  
Cc: Charlie Mueller <cmueller@graelaw.com>

Mon, Feb 6, 2023 at 10:18 AM

Louis,

We do not consent to the cancellation of the conference. You're free to direct whatever correspondence to the Court that you deem appropriate. Thank you.

Best,

**Previn A. Waran | Partner**  
**GRAE & GRAE, LLC**

The Equitable Building  
120 Broadway  
28th Floor  
New York, NY 10271  
[\(212\) 221-8763](tel:(212)221-8763)

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On Feb 6, 2023, at 10:12 AM, Louis Leon <[lleon@cafaroescq.com](mailto:lleon@cafaroescq.com)> wrote:

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**Louis Leon** <[lleon@cafaroescq.com](mailto:lleon@cafaroescq.com)>  
To: Previn Waran <[pwaran@graelaw.com](mailto:pwaran@graelaw.com)>  
Cc: Charlie Mueller <[cmueller@graelaw.com](mailto:cmueller@graelaw.com)>

Mon, Feb 6, 2023 at 10:20 AM

What's the reason for you withholding consent?

**Sincerely,**  
**Louis M. Leon, Esq.**  
**Associate**

Description: Doc1

108 West 39<sup>th</sup> Street, Suite 602

New York, NY 10018

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Fax. (212) 583-7401

[LLeon@CafaroEsq.com](mailto:LLeon@CafaroEsq.com)

[Quoted text hidden]



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**Previn Waran** <[pwaran@graelaw.com](mailto:pwaran@graelaw.com)>  
To: Louis Leon <[lleon@cafaroescq.com](mailto:lleon@cafaroescq.com)>  
Cc: Charlie Mueller <[cmueller@graelaw.com](mailto:cmueller@graelaw.com)>

Mon, Feb 6, 2023 at 10:37 AM

Louis,

We feel that it is important that we have a meaningful dialogue with the Court with respect to, among other things, your client's having gone missing, or otherwise unresponsive, for—at the very minimum, it would seem—the intervening three months from the November 1, 2022, date upon which Defendants served upon him their discovery requests. Simply put, Plaintiff isn't free to engage and disengage with this matter—which is one of his own creation—at his whim and fancy. In light of the foregoing, coupled with the fact that we are now over one year from the inception of this action, with no discovery whatsoever having taken place, we also want to discuss with the Court the setting of a schedule for the completion of the necessary discovery in this action. While we are always happy to discuss settlement, and feel that this is a matter that is ripe for potential amicable resolution, that process has no bearing on the parties' continuing obligations vis-a-vis discovery and the diligent prosecution of the action.

In any event, we have been directed to submit a status report to the Court in just over a week, or on or before February 14, 2023. As such, the convening of this conference dovetails nicely therewith, and might even obviate the need to file such submission.

Thank you.

Kind regards,

**Previn A. Waran | Partner**  
**GRAE & GRAE LLC**  
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New York, New York 10271  
(212) 221-8763  
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